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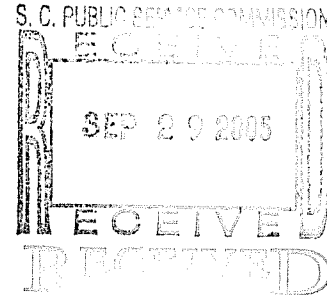
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2005-303-C

September 28, 2005

VIA FEDERAL EXPRESS DELIVERY

Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, SC 29211



Re: Comcast Phone of South Carolina, Inc.

SEP 29 2005

Dear Mr. Terreni:

PSC SC
DOCKETING DEPT.

✓
Enclosed please find an original and 10 copies of the "Application of Comcast Phone of South Carolina, Inc., For An Amended Certificate of Public Convenience and Necessity to Provide Local Exchange and Interexchange Telecommunications Services, For Flexible Rate Structure for Local Exchange Service Offerings First Approved in Docket No. 97-467-C, and For Alternative Regulation First Approved in Docket No. 95-661-C". Please file the original and return one (1) filed stamped copy to me.

Thank you for your assistance.

Very truly yours,

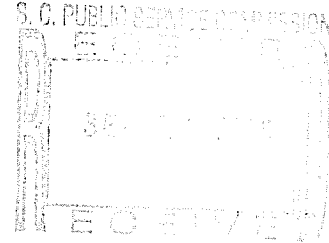
WOMBLE CARLYLE SANDRIDGE & RICE
A Professional Limited Liability Company

Lori Reese Patton

cc: Office of Regulatory Staff
William R. Atkinson, Esq.
Scott Elliot, Esq.
Patrick W. Turner
Stan Bugner

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF SOUTH CAROLINA**

DOCKET NO. 2005- 303-C



In the Matter of the Application of Comcast Phone of)
South Carolina, Inc., For An Amended Certificate of)
Public Convenience and Necessity to Provide Local)
Exchange and Interexchange Telecommunications)
Services, For Flexible Rate Structure for Local)
Exchange Service Offerings First Approved in Docket)
No. 97-467-C, and For Alternative Regulation First)
Approved in Docket No. 95-661-C)

Comcast Phone of South Carolina, Inc. (“Comcast Phone”) pursuant to S.C. Code Ann. §§ 58-9-280, the Rules of South Carolina Public Service Commission (“Commission”), and Section 253 of the Telecommunications Act of 1996, 47 U.S.C. § 253, hereby submits this Application to the South Carolina Public Service Commission to amend its Certificate of Public Convenience and Necessity previously approved by this Commission by Order Nos. 98-409 and 2004-604 in Docket No. 98-054-C. With this application, Comcast Phone requests authority to provide local telecommunications service within those portions of State of South Carolina served by Verizon South, Inc. (“Verizon”) and United Telephone Company of the Carolinas (“Sprint”)¹ and interexchange services on a statewide basis. With respect to its regulatory treatment, Comcast Phone requests flexible rate structure of its local exchange service offerings similar to that approved by Order No. 98-165 in Docket No. 97-467-C and alternative regulation approved by Order Nos. 95-1734 and 96-55 in Docket No. 95-661-C, and as modified by Order No. 2001-997 in Docket No. 2000-407-C. Comcast Phone further requests, pursuant to R. 103-601(3) of the

¹ Comcast Phone was previously granted authority to provide competitive local exchange services in those portions of the state served by BellSouth Telecommunications, Inc. (“BellSouth”)

Rules of the Commission, that the Commission waive application to it of certain rules, as discussed below.

In support of this application, Comcast Phone states as follows:

I. DESCRIPTION OF THE APPLICANT

1. Comcast Phone is a corporation organized and existing under the laws of the State of South Carolina. Copies of Comcast Phone's Articles of Incorporation, Article of Amendment, and Certificate of Existence were attached to its previous application in Docket No. 98-054-C, approved in Order Nos. 98-409 and 2004-604. Comcast Phone maintains its headquarters and principal place of business at 1500 Market Street, Philadelphia, PA 19102. Comcast Phone's principal place of business in South Carolina is located at 4151 Spruill Avenue, North Charleston, SC 29405.

2. Comcast Phone is a wholly-owned direct subsidiary of Comcast Phone II, Inc., a corporation formed under the laws of the state of Delaware and headquartered at the same location as Comcast Phone. Comcast Phone II, Inc., is a wholly-owned indirect subsidiary of Comcast Corporation, also headquartered at 1500 Market Street, Philadelphia, Pennsylvania 19102.

3. Comcast Corporation (NASDAQ: CMCSA, CMCSK) is principally involved in the development, management and operation of broadband cable networks and programming content. Comcast Corporation is the largest cable company in the United States, serving more than 21 million cable subscribers. Operating subsidiaries of Comcast Corporation are duly authorized to provide facilities-based local exchange and/or interexchange services to residential and business customers in various portions of the United States, in all states, except Alaska and Hawaii.

II. DESIGNATED CONTACTS

4. Correspondence or other communications concerning this Application should be directed to Comcast Phone's local counsel in this proceeding:

Lori Reese Patton, Esq.
Womble Carlyle Sandridge & Rice, PLLC
Suite 3500, One Wachovia Center
301 S. College Street
Charlotte, North Carolina 28202
Tel. (704) 331-4926
Fax (704) 338-7850

5. Copies of correspondence or other communications concerning this Application should be directed to:

Valerie Yates, Esquire
Counsel - Telephony
Comcast Cable Communications, LLC
1500 Market Street
Philadelphia, Pennsylvania 19102-2148
Tel. (215) 981-8585
Fax (215) 320-8050

6. Questions concerning Comcast Phone's ongoing operations should be directed to:

David Sered
Director of Government and Regulatory Affairs
Comcast Cable Communications, LLC
600 Galleria Parkway, Suite 1100
Atlanta, Georgia 30339
Tel. (678) 460-1610
Fax (678) 385-5101
david_sered@cable.comcast.com

7. The name and address of Comcast Phone's registered agent in South Carolina is:

CT Corporation System
75 Beattie Place
Two Insignia Financial Plaza
Greenville, South Carolina 29601

III. QUALIFICATIONS

8. Comcast Phone has the requisite financial, managerial and technical resources to provide the services proposed in this Application. As noted above, Comcast Phone is an indirect, wholly-owned subsidiary of Comcast Corporation. Comcast Phone will rely upon the financial resources of Comcast Corporation to fund its operations in South Carolina. In addition, Comcast Phone has an experienced management team in place who will oversee its business and technical operations. The Commission previously concluded in Order 98-409 that Comcast Phone possesses the financial, managerial and technical resources necessary to provide telecommunications services in South Carolina and the basis for the Commission's conclusion remains valid to date.

IV. DESCRIPTION OF SERVICES AND AUTHORIZATIONS REQUESTED

9. Comcast Phone has previously received authorization from the Commission to provide competitive local exchange, private line and special access services within the portions of South Carolina served by BellSouth. In this application, Comcast Phone requests that its certification be amended such that it is authorized to provide competitive local exchange service within those portions of the state served by Verizon, Sprint and BellSouth and interexchange service on a statewide basis. Prior to providing services in South Carolina, Comcast Phone will enter into interconnection agreements with applicable incumbent carriers and will file its final tariffs with the Commission. Initially, Comcast Phone intends only to provide exchange access services to other carriers. Comcast Phone will offer its services twenty-four hours per day, seven days per week. Customer service representatives will be available to assist its customers twenty-four hours a day, seven days a week. Customers may reach Comcast's customer service by calling its toll-free number 1 (800) COMCAST.

10. Comcast Phone does not presently seek authorization to provide local exchange services to customers located in those portions of the state served by a rural incumbent local exchange carrier (“LEC”), but it may seek to do so in a subsequent proceeding.

V. REGULATORY TREATMENT

11. Comcast Phone requests that the Commission allow it to employ a flexible local exchange rate structure first authorized by Order No. 98-165 in Docket No. 97-467-C throughout its authorized service territory. Specifically, Comcast Phone requests the following:

- a. the Commission adopt for Comcast Phone’s local exchange services a competitive rate structure incorporating maximum rate levels with the flexibility for rate adjustment below the maximum rate levels; and
- b. that its local exchange service tariff filings be presumed valid upon filing, subject to the Commission’s right within thirty (30) days to institute an investigation of such filings. At the discretion of the Commission, such filings would be suspended pending further order of the Commission and any such filings would be subject to the same monitoring process as is applied to other, similarly situated carriers.

12. Comcast Phone requests that all of its business service offerings be regulated pursuant to the procedures described and set out in Order No. 95-1734 and 96-55 in Docket No. 95-661-C, and as modified by Order No. 2001-997 in Docket No. 2000-407-C. It is Comcast Phone’s intent, by this request, to have its business services regulated in the same manner as this Commission has permitted for AT&T Communications of the Southern States. Specifically, Comcast Phone requests:

- a. removal of maximum rate tariff requirements for its business services, consumer card, operator service², and future private line, and customer network-type offerings; and
- b. that tariff filings for these uncapped offerings are presumed valid upon filing. If the Commission institutes an investigation of a particular filing within

² Excepting those operator-assisted calls where a consumer uses a local exchange carrier’s calling card to complete calls from locations which have not selected the local exchange carrier as their toll provider. Operator surcharges and per-minute rates for this type of call were capped by Order No. 2001-997 dated November 8, 2001.

seven days, the tariff filing will be suspended until further order of the Commission.

c. any relaxation in the reporting requirements that may be adopted for AT&T shall apply to the Comcast Phone as well.

VI. WAIVERS REQUESTED

13. Comcast Phone requests that the Commission grant it a waiver of those regulatory requirements inapplicable to similarly situated providers of interexchange and local exchange services. Commission Rule 103-603(3) provides that in “any case where compliance with any of these rules and regulations introduces unusual difficulty such rule or regulation may be waived by the Commission upon a finding by the Commission that such a waiver is in the public interest.” Compliance with certain Commission Rules will “introduce unusual difficulty” for Comcast Phone. Additionally, Comcast Phone asserts that granting the waivers requested herein would be “in the public interest.”

14. Financial Record-Keeping System (R. 103-611). Comcast Phone requests that it be exempt from any record-keeping rules or regulations that might require a carrier to maintain its financial records in conformance with the Uniform System of Accounts (“USOA”). The USOA was developed by the Federal Communications Commission as a means of regulating telecommunications companies subject to rate base regulation. Comcast Phone asserts that because it utilizes GAAP, the Commission will have a reliable means by which to evaluate operations. Therefore, Comcast Phone hereby requests to be exempt from any USOA requirements of the Commission.

15. Local Exchange Directories (R. 103-631). Comcast Phone requests that it not be required to publish local exchange directories. If and when Comcast Phone chooses to provide local exchange services to end-user customers, it will make arrangements with the incumbent LEC(s) whereby the names of its local exchange customers will be included in the directories

published by the incumbent LEC(s). LEC directories will also be modified to include Comcast Phone's customer service number. These directories will be distributed to all local exchange customers. It would be an unnecessary burden on Comcast Phone to require that it publish and distribute its own directory to all customers located within each exchange area, particularly since nearly all of these customers will be customers of the incumbent LEC(s). It is more efficient for the Company to include its limited customer list in the existing directories of the incumbent LEC(s).

16. Operating Area Maps (R. 103-612.2.3). Comcast Phone will be offering service within the geographic service areas of the incumbent LECs. Therefore, Comcast Phone requests that the Commission forbear from requiring it to "file with this Commission a map or maps showing its certificated area and/or exchange service area(s)."

VII. PUBLIC INTEREST

17. Comcast Phone submits that the public interest will be served by Commission approval of this application. Comcast Phone will provide high-quality service at competitive prices. The introduction of an additional competitor will expand the range of service options available to customers in South Carolina and will spur the provision of lower prices, higher quality, and more innovative and reliable product offerings from Comcast Phone and other carriers. Heightened competition in telecommunications will stimulate economic development in South Carolina and will promote the availability, affordability, and quality of telecommunications services for the State's consumers

18. Granting this application is consistent with S.C. Code Ann. § 58-9-280 and, in that regard, Comcast Phone makes the following representations to the Commission:

- a. Comcast Phone possesses the technical, financial, managerial resources sufficient to provide the services requested;

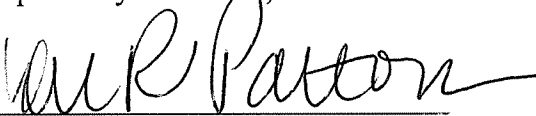
- b. Comcast Phone's services, to the extent it is required to do so by the Commission, will meet the service standards required;
- c. The provision of services by Comcast Phone will not adversely impact the availability of affordable telecommunications service;
- d. Comcast Phone, to the extent it is required to do so by the Commission, will participate in the support of universally available telephone service at affordable rates; and
- e. The provision of services by Comcast Phone will not adversely impact the public interest.

VIII. CONCLUSION

19. For the reasons set forth above, Comcast Phone respectfully requests that the Commission grant Comcast Phone the authority, regulatory treatment and waivers requested above as well as any other relief the Commission deems necessary and appropriate.

Respectfully submitted,

By:



Lori Reese Patton, Esq.
Womble Carlyle Sandridge & Rice, PLLC
Suite 3500, One Wachovia Center
301 S. College Street
Charlotte, North Carolina 28202
Tel. (704) 331-4926
Fax (704) 338-7850

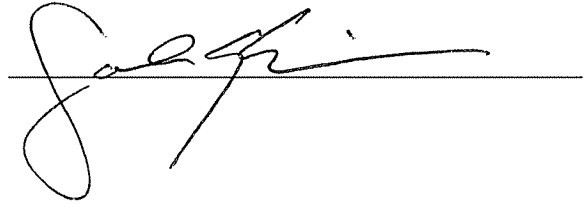
ATTORNEY FOR APPLICANT
COMCAST PHONE OF SOUTH CAROLINA, LLC

Dated: September 20, 2005

VERIFICATION

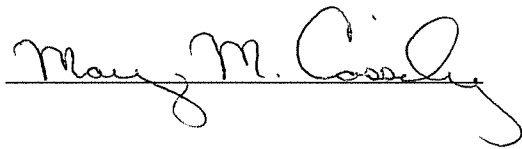
STATE OF PENNSYLVANIA)
)
COUNTY OF PHILADELPHIA)

I, John G. Sullivan, Vice President and Chief Counsel - Telephony for Comcast Cable Communications, LLC, being first duly sworn, verify that the statements contained in the foregoing application are true and correct to the best of my information, knowledge and belief.

A handwritten signature in dark ink, appearing to read "John G. Sullivan", is written over a horizontal line.

Subscribed and sworn to

Before me this 21th day of
September, 2005.

A handwritten signature in dark ink, appearing to read "Mary M. Cassidy", is written over a horizontal line.